

SEALED

FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MAY 15 2019

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

Plaintiff,

v.

RAMON SALAS (1),
also known as "Ramon Gonzalez,"
"G," and "Gee Loc,"
JOHN VALLE (2),
RAMIRO MATA (3),
[REDACTED]
CLARISELA BERMEA (5),
also known as "Mom,"
ANTHONY VALDEZ (6),
also known as "Colonel,"
JUAN FLORES (7),
also known as "Big Homie,"
JOSE VILLEGAS (8),
also known as "Toro,"
AUBREY RAMBY (9),
LUIS MARQUEZ (10),
PAUL KANAE (11),
also known as "Scams,"
DANIEL MORALES (12),
also known as "Cali,"
DANIEL RODRIGUEZ (13),
ARMANDO MORENO (14),
also known as "Mando,"
JAVIER MEDINA (15),
also known as "Javi,"
LUIS CADENA (16),
also known as "Beto,"
NELSON OCHOA (17),
MICHAEL ARAGON (18),
also known as "Rascal,"
LUIS GODINES (19),
also known as "Luke,"
GONZALO ROMO (20),
ADAM RODRIGUEZ (21),
also known as "Messy,"

SA 19 CR 0370 XR

COUNT 1: Title 21, U.S.C. §§ 846,
841(a)(1) & 841(b)(1): Conspiracy to
Possess with intent to Distribute
(Methamphetamine)

COUNT 2: Title 21, U.S.C. §§ 846,
841(a)(1) & 841(b)(1): Conspiracy to
Possess with intent to Distribute (Heroin)

COUNTS 3, 6, 8, and 10: Title 21, U.S.C.
§§ 841(a)(1) & 841(b)(1)(C), 18 U.S.C. § 2:
Possession with intent to Distribute
(Heroin), and Aiding and Abetting

COUNTS 4, 5, 11, and 19: Title 21, U.S.C.
§§ 841(a)(1) & 841(b)(1)(B), 18 U.S.C. § 2:
Possession with intent to Distribute
(Heroin), and Aiding and Abetting

COUNTS 7, 9, 12, 15, 20, 21: Title 21,
U.S.C. §§ 841(a)(1) & 841(b)(1)(A), 18
U.S.C. § 2: Possession with intent to
Distribute (Methamphetamine), and
Aiding and Abetting

COUNTS 13, 16, and 18: Title 21, U.S.C.
§§ 841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2:
Possession with intent to Distribute
(Heroin), and Aiding and Abetting

COUNT 14: Title 21, U.S.C. §§ 841(a)(1) &
841(b)(1)(C), 18 U.S.C. § 2: Possession with
intent to Distribute (Methamphetamine),
and Aiding and Abetting

COUNT 17: Title 21, U.S.C. §§ 841(a)(1) &
841(b)(1)(A), 18 U.S.C. § 2: Possession with
intent to Distribute (Fentanyl), and Aiding
and Abetting

PETE REYNA (22),
RICHARD MORAN (23),
also known as "Rico,"
JUAN SILVAS (24),
also known as "Big Time,"
ASHLEY GARZA (25),
FILADELFO URIBE-HERNANDEZ (26),
STERLING SHAW (27),
also known as "Max,"
ELIAZAR CANTU (28),
MARIA CANTU (29),
[REDACTED]
ERICA LEE ZUNIGA (31),

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)]

Beginning on or about May 2018, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
JOHN VALLE (2),
RAMIRO MATA (3),

[REDACTED]
CLARISELA BERMEA (5),
also known as "Mom,"
ANTHONY VALDEZ (6),
also known as "Colonel,"
JUAN FLORES (7),
also known as "Big Homie,"
JOSE VILLEGAS (8),
also known as "Toro,"
AUBREY RAMBY (9),
PAUL KANAE (11),
JAVIER MEDINA (15),
also known as "Javi,"
LUIS CADENA (16),
also known as "Beto,"

NELSON OCHOA (17),
 LUIS GODINES (19),
 also known as "Luke,"
 GONZALO ROMO (20),
 ADAM RODRIGUEZ (21),
 also known as "Messy,"
 PETE REYNA (22),
 RICHARD MORAN (23),
 also known as "Rico,"
 JUAN SILVAS (24),
 also known as "Big Time,"
 ASHLEY GARZA (25),
 FILADELFO URIBE-HERNANDEZ (26),
 ELIAZAR CANTU (28),
 and
 MARIA CANTU (29),

knowingly and intentionally conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a detectable amount of methamphetamine involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
RAMON SALAS (1)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
JOHN VALLE (2)	50 grams or more of methamphetamine
RAMIRO MATA (3)	50 grams or more of methamphetamine

[REDACTED]	50 grams or more of methamphetamine
CLARISELA BERMEA (5)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
ANTHONY VALDEZ (6)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine
JOSE VILLEGAS (8)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
AUBREY RAMBY (9)	a mixture or substance containing a detectable amount of methamphetamine
PAUL KANAE (11)	50 grams of methamphetamine
JAVIER MEDINA (15)	a mixture or substance containing a detectable amount of methamphetamine
LUIS CADENA (16)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
NELSON OCHOA (17)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
LUIS GODINES (19)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
GONZALO ROMO (20)	50 grams or more of methamphetamine
ADAM RODRIGUEZ (21)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine
PETE REYNA (22)	a mixture or substance containing a detectable amount of methamphetamine
RICHARD MORAN (23)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine
JUAN SILVAS (24)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine

ASHLEY GARZA (25)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
FILADELFO URIBE-HERNANDEZ (26)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
ELIAZAR CANTU (28)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
MARIA CANTU (29)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)]

Beginning on or about May 2018, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
JOHN VALLE (2),
RAMIRO MATA (3),

CLARISELA BERMEA (5),

also known as "Mom,"

ANTHONY VALDEZ (6),

also known as "Colonel,"

JUAN FLORES (7),

also known as "Big Homie,"

JOSE VILLEGAS (8),

also known as "Toro,"

AUBREY RAMBY (9),

LUIS MARQUEZ (10),

PAUL KANAE (11),

also known as "Scams,"

DANIEL MORALES (12),

also known as "Cali,"


DANIEL RODRIGUEZ (13),

ARMANDO MORENO (14),

also known as "Mando,"

JAVIER MEDINA (15),


also known as "Javi,"

MICHAEL ARAGON (18),
 also known as "Rascal,"
LUIS GODINES (19),
 also known as "Luke,"
GONZALO ROMO (20),
FILADELFO URIBE-HERNANDEZ (26),
STERLING SHAW (27),
 also known as "Max,"
ELIAZAR CANTU (28),
MARIA CANTU (29),

 and
ERICA LEE ZUNIGA (31),


knowingly and intentionally conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a detectable amount of heroin involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
RAMON SALAS (1)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
JOHN VALLE (2)	100 grams or more of a mixture or substance containing a detectable amount of heroin
RAMIRO MATA (3)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
	1 kilogram or more of a mixture or substance containing a detectable amount of heroin

CLARISELA BERMEA (5)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
ANTHONY VALDEZ (6)	100 grams or more of a mixture or substance containing a detectable amount of heroin
JUAN FLORES (7)	a mixture or substance containing a detectable amount of heroin
JOSE VILLEGAS (8)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
AUBREY RAMBY (9)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
LUIS MARQUEZ (10)	100 grams or more of a mixture or substance containing a detectable amount of heroin
PAUL KANAE (11)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
DANIEL MORALES (12)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
DANIEL RODRIGUEZ (13)	100 grams or more of a mixture or substance containing a detectable amount of heroin
ARMANDO MORENO (14)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
JAVIER MEDINA (15)	100 grams or more of a mixture or substance containing a detectable amount of heroin
MICHAEL ARAGON (18)	a mixture or substance containing a detectable amount of heroin
LUIS GODINES (19)	100 grams or more of a mixture or substance containing a detectable amount of heroin
GONZALO ROMO (20)	100 grams or more of a mixture or substance containing a detectable amount of heroin
FILADELFO URIBE-HERNANDEZ (26)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
STERLING SHAW (27)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
ELIAZAR CANTU (28)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
MARIA CANTU (29)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin

	100 grams or more of a mixture or substance containing a detectable amount of heroin
ERICA ZUNIGA (31)	100 grams or more of a mixture or substance containing a detectable amount of heroin

All in violation of Title 21, United States Code, Section 846.

COUNT THREE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about May 31, 2018, in the Western District of Texas, Defendants,

MICHAEL ARAGON (18),
also known as "Rascal,"
and
LUIS GODINES (19),
also known as "Luke,"

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense a mixture or substance containing a detectable amount of heroin, a schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) and 18 U.S.C. § 2]

That on or about July 19, 2018, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
LUIS MARQUEZ (10),
and
LUIS GODINES (19),
also known as "Luke,"

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 18 U.S.C. § 2.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)]

That on or about July 31, 2018, in the Western District of Texas, Defendants,

**RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
and
LUIS GODINES (19),
also known as "Luke,"**

did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT SIX

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about September 24, 2018, in the Western District of Texas, Defendants,

**RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
PAUL KANAE (11),
also known as "Scams,"
and
LUIS GODINES (19),
also known as "Luke,"**

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about November 30, 2018, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
and
LUIS GODINES (19),
also known as "Luke,"

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about November 30, 2018, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
and
LUIS GODINES (19),
also known as "Luke,"

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT NINE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about January 16, 2019, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
PAUL KANAE (11),
also known as "Scams,"

and
LUIS GODINES (19),
also known as "Luke,"

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

COUNT TEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about January 16, 2019, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
PAUL KANAE (11),
also known as "Scams,"
and
LUIS GODINES (19),
also known as "Luke,"

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT ELEVEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) and 18 U.S.C. § 2]

That on or about February 6, 2019, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
CLARISELA BERMEA (5),
also known as "Mom,"
JOSE VILLEGAS (8),
also known as "Toro,"

**PAUL KANAE (11),
also known as "Scams,"
DANIEL RODRIGUEZ (13),
ARMANDO MORENO (14),
also known as "Mando,"**

**[REDACTED]
[REDACTED]
and
ERICA LEE ZUNIGA (31),**

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 18 U.S.C. § 2.

COUNT TWELVE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 15, 2019, in the Western District of Texas, Defendants,

**CLARISELA BERMEA (5),
also known as "Mom,"
JUAN SILVAS (24),
also known as "Big Time,"
ASHLEY GARZA (25),
FILADELFO URIBE-HERNANDEZ (26),
ELIAZAR CANTU (28),
and
MARIA CANTU (29),**

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

COUNT THIRTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,

**RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
RAMIRO MATA (3),**

**JOSE VILLEGAS (8),
also known as "Toro,"
AUBREY RAMBY (9),**

**and
PAUL KANAE (11),
also known as "Scams,"**

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT FOURTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,

**RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
RAMIRO MATA (3),**

**JOSE VILLEGAS (8),
also known as "Toro,"
AUBREY RAMBY (9),**

**and
PAUL KANAE (11),
also known as "Scams,"**

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a

Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(C) and 18 U.S.C. § 2.

COUNT FIFTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,


RAMIRO MATA (3),


aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT SIXTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,

RAMIRO MATA (3),


aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT SEVENTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,

RAMIRO MATA (3),


aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 400 grams or more of a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (Fentanyl), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT EIGHTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 23, 2019, in the Western District of Texas, Defendants,

RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
CLARISELA BERMEA (5),
also known as "Mom,"
DANIEL MORALES (12),
also known as "Cali,"
FILADELFO URIBE-HERNANDEZ (26),
STERLING SHAW (27),
also known as "Max,"
ELIAZAR CANTU (28),
and
MARIA CANTU (29),

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT NINETEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) and 18 U.S.C. § 2]

That on or about March 6, 2019, in the Western District of Texas, Defendants,

**RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
JOHN VALLE (2),
and
GONZALO ROMO (20),**

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(B) and 18 U.S.C. § 2.

COUNT TWENTY

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about March 6, 2019, in the Western District of Texas, Defendants,

**JOHN VALLE (2),
and
GONZALO ROMO (20),**

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT TWENTY-ONE


[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about April 9, 2019, in the Western District of Texas, Defendants,

**RAMON SALAS (1),
also known as "Ramon Gonzalez," "G," and "Gee Loc,"
NELSON OCHOA (17),
and
LUIS GODINES (19),
also known as "Luke,"**


aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

A TRUE BILL/


FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:


ADRIÁN ROSALES
Assistant United States Attorney